

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

JANE DOE (pseudonym), )  
Plaintiff, )  
vs. ) No. 1:07-CV-286  
FRIENDFINDER NETWORK, INC., )  
and VARIOUS, INC., ) Jury Trial Demanded  
Defendants. )

**PROTECTIVE ORDER LIMITING SCOPE OF PLAINTIFF'S DISCOVERY**

Defendants Friendfinder Network, Inc.'s and Various, Inc.'s motion to quash plaintiff's notice of depositions pursuant to F.R.Civ.P 30(b)(6) and for a protective order limiting the scope of all plaintiff's discovery came on for ~~telephone conference~~ [REDACTED] is on June 4, 2009. Upon review of the moving papers, the response of plaintiff and arguments of counsel, and review of the Court record in this action and good cause appearing,

IT IS HEREBY ORDERED:

1. Plaintiff's [REDACTED] of Depositions Pursuant to F.R.Civ.P 30(b)(6) [REDACTED] are  
on the [REDACTED] categories [REDACTED] as follows:

- (1) FriendFinder Network, Inc. agent or representative most knowledgeable about relationships between Various. Inc. FriendFinder. Inc. FriendFinder Network. Inc. Streamray. Inc., Medlev.com Incorporated, and/or Fast Cupid. Inc. between May 2005 and December 2006;
- (2) Various. Inc. agent or representative most knowledgeable about relationships between Various. Inc., FriendFinder. Inc., FriendFinder Network. Inc. Streamray. Inc. Medley.com Incorporated, and/or Fast Cupid. Inc. between May 2005 and December 2006;
- (3) ~~FriendFinder Network, Inc. agent or representative most knowledgeable about "abuse support" at adultfriendfinder.com between May 2005 and~~

[REDACTED]  
[REDACTED]  
[REDACTED]

(4) Various, Inc. agent or representative most knowledgeable about "abuse support" at adultfriendfinder.com between May 2005 and December 2006;

(5) FriendFinder Network, Inc. agent or representative most knowledgeable about placement of "member has removed his/her profile" messages on adultfriendfinder.com between May 2005 and December 2006;

(6) Various, Inc. agent or representative most knowledgeable about placement of "member has removed his/her profile" messages on adultfriendfinder.com between May 2005 and December 2006;

(7) FriendFinder Network, Inc. agent or representative most knowledgeable about posting or re-posting of profiles first posted on adultfriendfinder.com on swingers.adultfriendfinder.com and/or lesbianpersonals.com between May 2005 and December 2006;

(8) Various, Inc. agent or representative most knowledgeable about posting or re-posting of profiles first posted on adultfriendfinder.com, on swingers.adultfriendfinder.com and/or lesbianpersonals.com between May 2005 and December 2006;

(9) FriendFinder Network, Inc. agent or representative most knowledgeable about agreements or arrangements with Google to achieve heightened position or visibility of AdultFriendFinder profiles on Google searches, between May 2005 and December 2006;

(10) Various, Inc. agent or representative most knowledgeable about agreements or arrangements with Google to achieve heightened position or visibility of AdultFriendFinder profiles on Google searches, between May 2005 and December 2006;

(11) FriendFinder Network, Inc. agent or representative most knowledgeable about placement of "sex partner" links or teasers on AdultFriendFinder between May 2005 and December 2006;

(12) Various, Inc. agent or representative most knowledgeable about placement of "sex partner" links or teasers on AdultFriendFinder between May 2005 and December 2006;

(13) FriendFinder Network, Inc. agent or representative most knowledgeable about placement of "member has removed his/her profile" messages on adultfriendfinder.com between May 2005 and December 2006;

(14) Various, Inc. agent or representative most knowledgeable about [REDACTED]

~~placement of "incident has removed his/her profile" messages on adultfriendfinder.com, between May 2005 and December 2006;~~

(15) FriendFinder Network, Inc. agent or representative most knowledgeable about placement of adultfriendfinder.com advertisements placed on other websites, between May 2005 and December 2006;

*Various, Inc.*

(16) ~~Various, Inc.~~ agent or representative most knowledgeable about placement of adultfriendfinder.com advertisements placed on other websites, between May 2005 and December 2006;

(17) FriendFinder Network, Inc. agent or representative most knowledgeable about the FriendFinder.com "Affiliate Programs" between May 2005 and December 2006;

(18) Various, Inc. agent or representative most knowledgeable about the FriendFinder.com "Affiliate Programs" between May 2005 and December 2006.

2. At a mutually agreeable time and place after June 5, 2009, *and before June* ~~in 2009~~

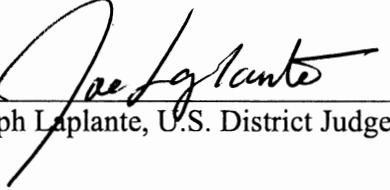
~~1. Defendants' participation in, and cooperation with, the following topics:~~

- a) The profile information at issue in this case, provided by a third party, that purported to be a German-speaking female living in NH;
- b) Defendants' revenues and profits, if any, received from members or users who may have acted on the web manifestation of such profile;
- c) Defendants' participation in, and cooperation with, the Hanover Police Department's criminal investigation into the third party's actions in creating and posting the profile;
- d) How the social networking sites at issue generally function from signup and entry of profile data to manifestations of members on the web.

3. Plaintiff may ask interrogatories and request documents that pertain to these topics.
4. Absent a good cause showing of relevance and that the burden and expense does not exceed the probative value of such requests, plaintiff's discovery shall not include information or documents related to:
  - a. Defendants' general financial and business information;
  - b. Data related to non-party customers of defendants;
  - c. Profile information not directly at issue in this case;
  - d. Defendants' business relationships with third parties.

IT IS SO ORDERED.

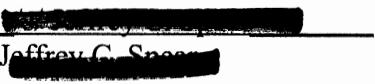
Dated: June 4, 2009

  
Hon. Joseph Laplante, U.S. District Judge

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2009, I caused this proposed order to be sent to the following counsel of record via ECF:

Ned Whittington, Esq.  
Whittington Law, LLC  
300 South Wacker Drive  
Chicago, IL 60606  
ned@whittington-law.com

  
Jeffrey G. Sparer